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5 *Attorney for Plaintiff Finnmark Designs, LLC*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 FINNMARK DESIGNS LLC, a Nevada) **Case No. 2:23-cv-00018-JCM-VCF**
9 limited liability company,)
9 Plaintiff,)
10 v.)
11 ROBYN OPENSHAW, an individual;)
12 GREENSMOOTHIEGIRL.COM, INC., a)
13 Utah Corporation, d/b/a INFL)
13 PRODUCTS;)
14 GREENSMOOTHIEGIRL.COM INC., a)
14 Florida Corporation,)
15 Defendants.)
15 GREENSMOOTHIEGIRL.COM INC., a)
16 Florida Corporation,)
17 Counterclaimant,)
18 v.)
19 FINMARK DESIGNS LLC; a Nevada)
20 Limited Liability Company; GARETT)
20 GORDON, an individual; CRUZEZ INC.,)
21 a Washington Corporation; JOE CRUZ,)
21 an individual; DOES 1 - 10, inclusive;)
22 ROE ENTITIES 1 - 10, inclusive,)
22 Counterclaim Defendants.)
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15 **STIPULATION AND ORDER FOR
EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO
COUNTERCLAIM**

15 **(First Request)**

24 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1,
25 Plaintiff/Counterclaim Defendant Finnmark Designs, LLC ("Finnmark"), by and through its
26 counsel of record, and Defendants, by and through their counsel of record, hereby agree and
27 stipulate to a 24-day extension of time for Finnmark to file and serve its answer or otherwise
28 respond to the Counterclaim (ECF No. 9). Plaintiff was served on February 14, 2023, and so the

1 current response deadline is March 7, 2023. The parties agree that Defendant shall have up to
2 and including March 31, 2023 to answer or otherwise respond to the Counterclaim (ECF No. 9).
3 This is the first request by the parties for such an extension.

4 Good cause for this request exists to accommodate existing personal conflicts by
5 Finnmark's counsel. In addition, while Finnmark has been served with the Counterclaim, the
6 other named Counterclaim Defendants have not yet been served with the Counterclaim. The
7 parties expect such service to be effectuated in due course, at which point the additional
8 Counterclaim Defendants will have at least 21 days to answer or otherwise respond to the
9 Counterclaim. As such, the extension of time will place Finnmark's response deadline in line
10 with the other Counterclaim Defendants.

11 Moreover, counsel for Finnmark and counsel for Defendants have already held the
12 required discovery conference and anticipate submitting a proposed discovery plan and
13 scheduling order to the Court in due course. The parties intend to proceed forward with
14 discovery in this case and so the extension of time sought by Finnmark relative to the
15 Counterclaim is not for purposes of delay.

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For the foregoing reasons, the parties hereby stipulate and agreed to extend the deadline for the Finnmark to answer or otherwise respond to the Counterclaim from March 7, 2023, to March 31, 2023.

DATED: March 7, 2023

IT IS SO AGREED AND STIPULATED:

KEVIN E. BECK, LTD.

GILE LAW GROUP LTD.

/s/ Kevin E. Beck

Kevin E. Beck, Esq.
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/s/ Ryan Gile

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*Attorney for Defendants Robyn Openshaw,
GreenSmoothieGirl.com, Inc., and
GreenSmoothieGirl.com Inc.*

Attorney for Plaintiff Finnmark Designs, LLC

IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

3-7-2023

DATED:

CERTIFICATE OF SERVICE

2 I hereby certify that on March 7, 2023, I electronically filed the foregoing document with
3 the Clerk of the Court using CM/ECF. I further certify that a true and correct copy of the
4 foregoing document is being served via transmission of Notices of Electronic Filing generated by
5 CM/ECF to all participants in the case who are registered CM/ECF users.

/s/ Ryan Gile
Employee, Gile Law Group Ltd.